

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**In Re: BP P.L.C. SECURITIES
LITIGATION**

) **MDL No. 2185**
)
) **Civil Action No. 4:10-md-02185**
)
) **Hon. Keith P. Ellison**

In Re: BP ERISA LITIGATION

) **Civil Action No. 4:10-cv-04214**
)
) **Hon. Keith P. Ellison**
)
)

PLAINTIFFS' JOINT REPORT
ON PROPOSED ORGANIZATIONAL STRUCTURE

Now come the Plaintiffs in the BP ERISA Litigation and make this Joint Report to the Court on Proposed Organizational Structure and would respectfully show the Court the following:

The BP ERISA Plaintiffs have worked diligently to resolve the competing motions to appoint lead counsel (Case No. 4:10-cv-04214, Docket Nos. 9-11 and 27-31; Case No. 4:10-mdl-2185, Docket Nos. 44-46, 67-70, 77, 81 and 83-85) and now have consent from all Plaintiffs and their counsel in the ERISA actions to propose the following organizational structure for the ERISA Plaintiffs subject to approval by this Court: The Liner Grode firm and Milberg LLP would serve as co-lead counsel with an Executive Committee consisting of Harwood Feffer LLP and Squitieri & Fearon, LLP. Ajamie LLP and The Lanier Law Firm would serve as co-liaison counsel. Plaintiffs will submit a proposed order for the Court's consideration by February 10, 2011.

DATE: February 3, 2011

Respectfully submitted,

/s/ Thomas R. Ajamie

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Plaintiffs' Joint Report on Proposed Organizational Structure has been served through the Court's electronic filing and notification system on February 3, 2011.

/s/ Thomas R. Ajamie

Thomas R. Ajamie